

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

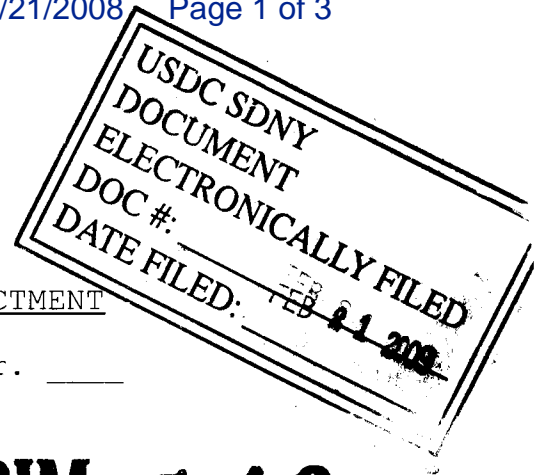
- v. - :

JOSE SOTO-ESPINOZA, :

Defendant. :

INDICTMENT

08 Cr. _____



08 CRIM 146

COUNT ONE

(Conspiracy to Commit Money Laundering)

The Grand Jury charges:

1. From in or about March 2007 through in or about October 2007, in the Southern District of New York and elsewhere, JOSE SOTO-ESPINOZA, the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Section 1956(a)(1)(B)(i).

2. It was a part and an object of the conspiracy that JOSE SOTO-ESPINOZA, the defendant, and others known and unknown, in the United States, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions, to wit, the transfer of approximately \$90,000.00 in cash to other individuals, which in fact involved the proceeds of specified unlawful activity, to wit, the proceeds of illegal narcotics


transactions, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).


Overt Act

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about October 25, 2007, JOSE SOTO-ESPINOZA, the defendant, transferred to a co-conspirator not named herein as a defendant a bag containing approximately \$90,000.00.

(Title 18, United States Code, Section 1956(h).)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

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- v. -

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Defendant.

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08 Cr. _____

(18 U.S.C. §§ 1956(h))

MICHAEL J. GARCIA

United States Attorney.

A TRUE BILL



Foreperson.

Post 11/37

Indictment filed, case assigned to Judge
Hellerstein.

F. Illana, USMS